

## **REMARKS**

The enclosed is responsive to the Examiner's Final Office Action mailed on July 30, 2004 and is being filed pursuant to a Request for Continued Examination (RCE) as provided under 37 CFR 1.114. At the time the Examiner mailed the Office Action claims 11-19 were pending. By way of the present response the Applicants have: 1) amended claim 11 and added new claims 20-32. As such, claims 11-32 are now pending. The Applicants respectfully request reconsideration of the present application and the allowance of all claims now presented.

### ***35 U.S.C. § 102 Rejections***

Claim 11 was rejected under 35 U.S.C § 102(a) as being anticipated by Yuhder Lin, "The Design and Implementation of Jato: A New Binary File Format for Java", June 2000 (hereinafter "Lin"). Specifically, the Examiner stated that Page 2 (Figure 1) and Page 50 (Figure 7) of Lin discloses "a portal server to retrieve classfiles from an Internet site on behalf of a data processing device, the data processing device comprising a processor for processing program code and an interpreter module for interpreting classfiles; wherein the portal server comprises a content conversion module to analyze and convert the classfiles prior to transmission to the data processing device" as recited in Claim 11.

Applicant respectfully disagrees with this interpretation of Lin. Lin does not disclose a portal server which retrieves classfiles from an internet site and converts

the classfiles on behalf of a data processing device. Figure 1 of Lin discloses a standard Java implementation which uses a Java Virtual Machine ("JVM") as an interface to translate Java bytecode for an operating system on a personal computer. No mention is made of a portal server to perform classfile conversion operations. Figure 50 of Lin illustrates a modified JVM which is the focus of the "Jato system" described in Lin. However, neither Figure 50 of Lin, nor the associated text, discloses or suggests the use of a portal server to perform classfile conversion operations. Claim 11 has been amended to more clearly recite the relationship between the portal server and the data processing device.

For the foregoing reasons, Applicant respectfully submits that Claim 11 is allowable over Lin. In addition, because claims 12-21 claim priority from Claim 11 and include additional features, Applicants further submit that these claims are in condition for allowance.

### ***35 U.S.C. § 103 Rejections***

Claims 12-15, 17-18 were rejected under 35 U.S.C § 103(a) as being unpatentable over Yuhder Lin, "The Design and Implementation of Jato: A New Binary File Format for Java", in view of Bradley et al., "JAZZ: An Efficient Compressed Format for Java Archive Files", November 1998 (hereinafter "Bradley"). Bradley describes techniques for combining multiple classfiles into a single file. As illustrated in Figure 1 of Bradley, the single file (referred to as a "Jazz File") has a unified constant pool which eliminates redundant constant pool entries.

However, Bradley does not disclose or suggest a system in which a portal server retrieves classfiles from an internet site and converts the classfiles on behalf of a data processing device. Bradley does not even mention the concept of performing processing operations at a server on behalf of a data processing device. As such, Applicants respectfully submit that Claims 11-19 are in condition for Allowance.

### ***New Claims 22-30***

New independent Claim 22 claims reads as follows:

A method for converting a plurality of classfiles into a unified classfile bundle comprising:

generating a global method entry within the unified classfile bundle for each method within the plurality of classfiles, each global method entry containing data related to the method from which it was generated;

generating a global field entry within the unified classfile bundle for each field within the plurality of classfiles, each global field entry containing data related to the field from which it was generated;

converting local constant pool entries from local constant pools of each of the plurality of classfiles which reference methods and fields of each classfile into global constant pool entries within the unified classfile bundle, wherein converting comprises removing redundant local constant pool entries and replacing the references to methods and fields within each of the local constant pool entries with offsets pointing to the global method entries and field method entries, respectively, within the unified classfile bundle.

Applicant respectfully submits that new Claim 22 is neither anticipated nor suggested by Lin and/or Bradley. For example, neither Lin nor Bradley discloses or suggests generating global method entries and global field entries within a unified classfile bundle, and generating global constant pool entries by replacing references to methods and fields with offsets pointing to the global method entries and field

entries. The “branch offsets” described in Bradley at page 5, column 1, last paragraph are related to branch instructions used in conjunction with the Jazz file and are therefore different from the offsets claimed in Claim 22. In fact, Bradley teaches away from the use of offsets used within constant pool entries by stating at page 5, column 2, paragraph 4, that “[t]he relative position of constant pool entries is completely irrelevant.”

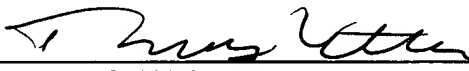
For the foregoing reasons, Applicant submits that Claim 22 is allowable over Lin and Bradley. Claims 23-32 include all of the features of Claim 22 as well as additional features. As such, Applicants further submit that Claims 20-30 are in condition for allowance.

## CONCLUSION

Applicant submits that all pending claims are allowable over the cited references. If there are any additional charges, please charge Deposit Account No. 02-2666. If a telephone interview would in any way expedite the prosecution of this application, the Examiner is invited to contact Thomas Webster at (408) 720-8300.

Respectfully submitted,  
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